

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 18-CR-30039-MGM
)	
EDWARD V. LABOURSOLIERE,)	
Defendant.)	

JOINT INTERIM STATUS CONFERENCE MEMORANDUM

The United States of America, by Andrew E. Lelling, United States Attorney for the District of Massachusetts and the defendant, Edward V. Laboursolier, by and through his attorney, A.J. O'Donald, Esq., submit this memorandum to address the issues delineated in Local 116.5(b)(1)-(10).

1. The government has made its automatic disclosures and the defense is reviewing the discovery materials.
2. The government will provide discovery in response to any future request according to the Local Rules and pursuant to the Federal Rules of Criminal Procedure, including any supplemental discovery if any additional materials are obtained.
3. The defendant does not anticipate making any discovery requests at this time.
4. There is no protective order in this case.
5. The defendant has not yet determined whether he will be filing any motions under Fed. R. Crim. P. 12(b).
6. The parties have not yet determined whether they will be calling expert witnesses at trial at this time.
7. The defendant requests an additional 30 days to determine whether he will pursue a defense of insanity, public authority, or alibi.

8. The parties agree that the ends of justice are served by granting a continuance until the date of the next status conference, and excluding this time from the calculation of the time within which the trial must begin outweighs the best interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A) and Local Rule 112.2. This exclusion will serve the ends of justice because it will permit time for the defendant to consult with his attorney and decide how he wishes to proceed. A proposed order of excludable delay is attached to this status report.

9. The parties have not yet begun to discuss a potential plea. The parties anticipate that a trial in this matter would last about three days.

10. The parties request that a final status conference or an initial pre-trial status conference be scheduled in mid to late February.

Respectfully submitted,
ANDREW E. LELLING
UNITED STATES ATTORNEY

By: /s/ Deepika Bains Shukla
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Certificate of Service

December 11, 2018

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Deepika Bains Shukla

Deepika Bains Shukla

Assistant United States Attorney